



DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
TENNESSEE DIVISION OF AIR POLLUTION CONTROL  
ANNUAL INSPECTION

Reference No.: 41-0011  
State Class: CM  
Pollutant(s): VOCs

Environmental Specialist: BSH  
Route To: CMW

Date Inspected: August 30, 2010

Company: TRICOR  
Location address: Turney Center Industrial Prison  
1499 R. W. Moore Memorial Highway  
City/State/Zip: Only, TN 37140-4050

Company Contact/Title: John Mack Brown  
Maintenance Manager  
240 Great Circle Rd.  
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Nashville, TN 37228-2696  
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Don Goolsby  
Gen. Mgr. Of Mfg  
TRICOR @ Turney Center  
1499 R. W. Moore Memorial Hwy.  
Only, TN 37340  
(931) 729-5161 ext. 2210  
(931) 729-2997  
[Don.Goolsby@tn.gov](mailto:Don.Goolsby@tn.gov)

Does Company impact an additional control area? YES/ NO : NO  
If Yes, pollutant type:

Does Company have: NSPS (Part 60)? EE PSD? No  
NESHAPS (Part 61)? No MACT (Part 63) No

If YES, give subpart for NSPS, NESHAPS, MACT

Sources If YES to any, indicate point number(s): 07

Date of the last annual inspection: June 23, 2009  
Time period covered by this inspection, from: January 2009 to December 2009  
Is inspection partial or comprehensive? Comprehensive

Total time required for this inspection (hours): hrs.  
Was company in compliance during entire inspection time period? Yes  
If NO, explain in final paragraph

If CM source: Date report received in EFO: (postmarked) March 31, 2009  
Date report review complete/acknowledged by EFO: August 31, 2010  
Did report have deviations from permit conditions (Y/N)? NO

**EXECUTIVE SUMMARY:**

Tennessee Rehabilitative Initiative in Correction (TRICOR) operates several manufacturing industries within the confines of the TDOC Turney Center Prison located in Only, Tennessee. They are as follows: Point 03 – Woodworking Operation; Point 04 – Wood Furniture Coating Operation; Point 07 – Metal Furniture Coating Operation; and Point 09 – Sign Plant Operation.

The conditional major operating permit (#454137P) for this facility was issued on October 18, 2004 and is set to expire on June 1, 2014. This permit will be used in this report to determine compliance.

The two previous inspections conducted on May 29, 2008 and June 23, 2009 were both comprehensive and covered the entire source. In both cases, the facility was in compliance with all permit conditions.

**General Permit Conditions:**

Condition #1 identifies Mr. John M. Brown as the person that binds the facility in environmental and permitting affairs. No changes have been made. The facility is in compliance.

Conditions #2, #3, and #4 are informational conditions indicating that the facility opted out of Title V and list the limiting conditions for maintaining the conditional major status.

Condition #5 limits VOCs emitted from this source to less than 95 tons during all intervals of twelve consecutive months. For the purpose of calculating facility-wide VOC emissions, five tons will be added to overall emissions to allow for aerosol can spraying, welding, machinery lubrication and other similar operations. Compliance with this condition shall be determined from the logs required by condition #15. According to data received in the conditional major report, the facility's highest emissions occurred during the twelve-consecutive-month period ending August 2009, with emissions of 12.94 tons of VOCs.

Condition #6 limits single HAPs to less than 9.2 tons during all intervals of twelve-consecutive-months. Any combination of HAPs shall not exceed 22.5 tons during all intervals of twelve-consecutive-months. HAPs emitted from spraying aerosol cans, welding, machinery lubrication, and other similar (non-permitted) shall be estimated to be less than one ton per year. This figure will be added to the facility-wide total of actual HAP emissions for each twelve consecutive month period. According to the data received in the conditional major report, the facility's highest single HAP emissions occurred during the twelve-consecutive-month period ending December 2009 with 1.70 tons of ethylene emitted. The facility's highest combined HAP emissions occurred during the twelve-consecutive-month period ending March 2009, with 5.15 tons of combined HAP emissions.

Condition #7 requires that purchase orders and invoices for all VOC and HAP containing materials, MSD sheets be maintained for at least five years in order to allow for inspection by Tennessee Division of Air Pollution Control (TDAPC) personnel. These records must list the VOC content in pounds per gallon and HAP content by weight. **No field visit was made to this site. Only the ACR was reviewed and found to be in compliance.**

Condition #8 limits visible emissions from any stack opening or vent to less than 20% opacity as determined by EPA Method 9, except for one six minute period in one hour, or less than twenty-four minutes in twenty-four hours is allowed. **No field visit was made to this site. Only the ACR was reviewed and found to be in compliance.**

Condition #10 states that excess emissions shall be addressed as specified in TDAPCR 1200-3-20. Based on the information submitted in the conditional major report, there have been no excess emissions during this reporting period, the facility is in compliance.

Condition #11 requires that a report stating the compliance status of this facility with permit conditions #5, #6, #24, and #26 must be submitted by March 31 of every year beginning 2005. This report is to include the records required by conditions #15 and #26. The Columbia Environmental Field Office (EFO) received this report on March 31, 2010. According to the data in this report the facility is in compliance with the referenced permit conditions.

Condition #12 requires that the VOC content in pounds per gallon of all VOC containing materials be determined and compiled in tabular format. These calculations are to be updated within 90 days of the initial use or change in formulation. **No field visit was made to this site. Only the ACR was reviewed and found to be in compliance.**

Condition #15 requires that the facility calculate the actual quantities of VOCs and HAPs emitted from this facility each month and all periods of twelve consecutive months. These logs shall readily show compliance with conditions #5 and #6 and be updated within thirty days of the end of each month and retained for at least five years. **No field visit was made to this site. Only the ACR was reviewed and found to be in compliance.**

#### **41-0011-03 Woodworking Operation**

Condition #16 limits process weight rate to 800 pounds per hour (lb/hr). The facility has not modified this source since the issuance of this permit; therefore the process weight rate has not changed.

Condition #17 limits the PM emitted from this source to less than 4.63 lbs/hr. Compliance with this condition is assured by not operating without the control equipment. **No field visit was made to this site. Only the ACR was reviewed and found to be in compliance.**

Routine maintenance is to be performed on the air pollution control devices (Condition #18). The facility maintains the air pollution control devices in good working order. **No field visit was made to this site. Only the ACR was reviewed and found to be in compliance.**

Condition #19 states that should a malfunction occur, operation of the processes served by the device shall be as described by TAPCR 1200-3-20. **No field visit was made to this site. Only the ACR was reviewed and found to be in compliance.**

#### **41-0011-04 Spray Coating Operations**

This source consists of five spray booths and a gas-drying oven for the coating of wood furniture. Exhaust filters are used as controls.

Condition #20 requires that the PM emitted from this source not exceed 0.925 lbs/hr. Compliance with this condition is assured by this source never operating without the control equipment (exhaust filters) operating properly. **No field visit was made to this site. Only the ACR was reviewed and found to be in compliance.**

Visible emissions from the stack(s) are not to exceed 10% opacity as determined by EPA Method 9 (Condition #21). **No field visit was made to this site. Only the ACR was reviewed and found to be in compliance.**

Condition #22 requires that routine maintenance as required to maintain specified emissions limits be performed on the air pollution control device(s). **No field visit was made to this site. Only the ACR was reviewed and found to be in compliance.**

#### **41-0011-07 Surface Coating of Metal Furniture (NSPS)**

This source is a surface coating operation for metal furniture and miscellaneous metal products. This operation consists of four (4) electrostatic spray booths and an associated curing oven. The facility has completely eliminated all liquid surface coating of the furniture. There is also a separate spray room for coating large objects and other special operations.

Condition #24 limits VOC emitted from this source to less than 40 tons during all intervals of 12 consecutive months. Compliance with this condition is indicated from the records required by condition #15. According to the conditional major report, the entire facility emitted a total of 1.83 tons of combined VOC's during the twelve-month period ending December 2009 (see attached). The facility is in compliance.

Condition #25 requires that the facility furnish the results of the performance test required by 40 CFR 60, subpart EE within a year of the issuance of permit #454137P. Mr. Brown says the facility is no longer coating metal furniture with VOC-containing coatings. The permit states clearly that metal furniture is the only product subject to these restrictions. The facility has data that would indicate that liquid, VOC solvent coatings are being utilized on miscellaneous metal (fencing). With conditions #25 and #26 disregarded, there is no recording requirement.

Condition #26 limits the emission rate from the metal furniture operation to 7.51 pounds of VOC per gallon of solids applied, monthly. According to yearly data received in the CM report, Forest Green is the highest VOC containing coating used on metal, with 4.98 lb/gal.

Condition #27 limits TSP to less than 1.08 lb/hr (TAPCR 1200-3-7-.01(5)). Compliance is indicated by use of exhaust filters. **No field visit was made to this site. Only the ACR was reviewed and found to be in compliance.**

Condition #28 requires that the visible emissions from the stacks not exceed 10% opacity as determined by EPA Method 9. **No field visit was made to this site. Only the ACR was reviewed and found to be in compliance.**

Condition #29 requires that routine maintenance as required to maintain specified emissions limits be performed on the air pollution control device(s). Maintenance logs are to be recorded in a suitable permanent form and kept on-site for at least five years. **No field visit was made to this site. Only the ACR was reviewed and found to be in compliance.**

**41-0011-09 Sign Plant and Dip Coating Operation**

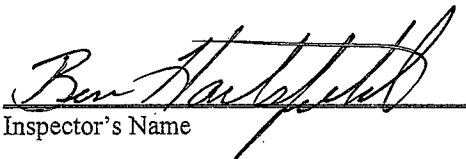
This source consisted of one spray booth with exhaust filter control, one cleaning operation, one coating dip tank with dry off area and screen printing equipment. This source was not to operate unless the control equipment (exhaust filters) were in place and operating properly. The spray booth, screen printing equipment, cleaning operation, dip tank and dry off area are off site.

Condition #31 limits particulate matter (TSP) to less than 0.02 grains per dry standard cubic foot (dscf). Operating this source with exhaust filters functioning properly is required to be in compliance with this condition. **No field visit was made to this site. Only the ACR was reviewed and found to be in compliance.**

Condition #32 requires that routine maintenance as required to maintain specified emissions limits be performed on the air pollution control device(s). Maintenance logs are to be recorded in a suitable permanent form. **No field visit was made to this site. Only the ACR was reviewed and found to be in compliance.**

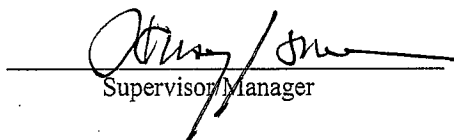
There are currently no complaints or issues of non compliance registered against this facility

It is the opinion of this inspector that TRICOR at Turney Center is **In Compliance** in that compliance problems were found as described previously in this report.

  
Inspector's Name

VEE Certification Number: 1948  
Certification Expiration Date: September 2010

I verify that the format and content of this report conforms to established TN Division of Air Pollution Control annual inspection standard operational procedures guidance and that the compliance determination made in this report is correct.

  
Supervisor/Manager

8 SEP 2010  
Date